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6	UNITED STATES DISTRICT COURT			
7	DISTRICT OF NEVADA			
8	UNITED STATES OF AMERICA,	Case No. 2:24-mj-00379-NJK		
9	Plaintiff,	Stipulation for an Order		
10	v.	Directing Probation to Prepare a Criminal History Report		
11	OSCAR JAVIER SANCHEZ-VAZQUEZ,			
12	aka "Oscar Javier Sanchez-Vasquez," aka "Oscar Javier Sanchez,"			
13				
14	Defendant.			
15	IT IS HEREBY STIPULATED AND AGREED, by and between Jason M.			
16	Frierson, United States Attorney, and Justin Washburne, Assistant United States Attorney,			
17	counsel for the United States of America, Rene L. Valladares, Federal Public Defender, and			
18	Rick Mula, Assistant Federal Public Defender, counsel for defendant OSCAR JAVIER			
19	SANCHEZ-VAZQUEZ, that the Court direct the U.S. Probation Office to prepare a report			
20	detailing the defendant's criminal history.			
21	This stipulation is entered into for the following reasons:			
22	1. The United States Attorney's Office has developed an early disposition			
23	program for immigration cases, authorized by the Attorney General pursuant to the			
24				

1	PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has		
2	extended to the defendant a plea offer in which the parties would agree to jointly request ar		
3	expedited sentencing immediately after the defendant enters a guilty plea.		
4	2.	The U.S. Probation Office	cannot begin obtaining the defendant's criminal
5	history until after the defendant enters his guilty plea unless the Court enters an order		
6	directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of		
7	a defendant's initial appearance when charged by indictment.		
8	3.	The U.S. Probation Office	informs the government that it would like to begin
9	obtaining the criminal history of defendants eligible for the early disposition program as		
10	soon as possible after their initial appearance so that the Probation Office can complete the		
11	Presentence Investigation Report by the time of the expected expedited sentencing.		
12	4.	Accordingly, the parties rec	quest that the Court enter an order directing the
13	U.S. Probation Office to prepare a report detailing the defendant's criminal history.		
14	DATED this 15 <sup>th</sup> day of May, 2024.		
15			Respectfully Submitted,
16		VALLADADEC	LACONIA EDIEDONI
17	1	ALLADARES  olic Defender	JASON M. FRIERSON United States Attorney
18	/ /D: 1.16	,	/ / 7 117
19	/s/Rick Mula Assistant Federal Public Defender	/s/ Justin Washburne JUSTIN J. WASHBURNE Assistant United States Attorneys	
20	Counsel for Defendant OSCAR JAVIER SANCHEZ-VAZQUEZ		
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24			

1 UNITED STATES DISTRICT COURT **DISTRICT OF NEVADA** 2 UNITED STATES OF AMERICA, Case No. 2:24-mj-00379-NJK 3 Plaintiff, **Order Directing Probation to** 4 Prepare a Criminal History Report v. 5 OSCAR JAVIER SANCHEZ-VAZQUEZ, 6 aka "Oscar Javier Sanchez-Vasquez," aka "Oscar Javier Sanchez," 7 Defendant. 8 9 Based on the stipulation of counsel, good cause appearing, and the best interest of 10 justice being served: 11 IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a 12 report detailing the defendant's criminal history. 13 DATED this 15th day of May, 2024. 14 15 HON. NANCY J. KOPPE 16 UNITED STATES MAGISTRATE JUDGE 17 18 19 20 21 22 23 24